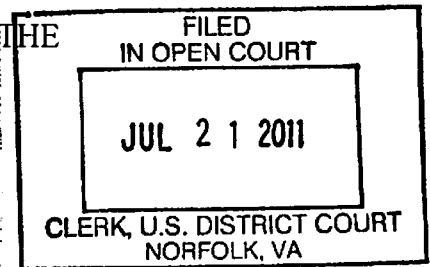


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEW DIVISION



UNITED STATES OF AMERICA )

V. )

DION BARTLETT )

Criminal No. 4:11cr35

STATEMENT OF FACTS

Comes now the United States and offers to the court that had the above-styled matter proceeded to trial the United States would have proven the following facts beyond a reasonable doubt.

1. On April 14, 2011, the Virginia State Police Tri-Rivers Task Force used a confidential informant to make a controlled purchase of cocaine base from the defendant. This transaction took place at a McDonald's in Williamsburg, Virginia. The purchased substance was tested by the Virginia State Laboratory and was determined to be 3.8 grams of cocaine base, a schedule II, narcotic controlled substance.

2. Information received by law enforcement agents established that the defendant and co-conspirators were receiving distribution quantities of cocaine and cocaine base from sources of supply in Newport News, Virginia during the dates in the indictment. These quantities would then be sold in the Williamsburg, Virginia area.

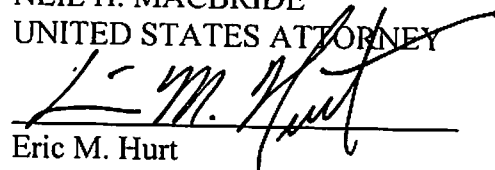
3. On April 27, 2011, a search warrant was executed at the residence of the defendant. During the search warrant 20.1 grams of cocaine base was discovered along with 27.5 grams of cocaine. In addition, scales, pyrex dishes and baking soda were all discovered at the residence. These items along with the quantities of cocaine base and cocaine are indicative of manufacturing cocaine base and distribution of cocaine base and cocaine.


DB.  
WBD  
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EAT

4. These events occurred in the Newport News Division of the Eastern District of Virginia.

Respectfully submitted,

NEIL H. MACBRIDE  
UNITED STATES ATTORNEY

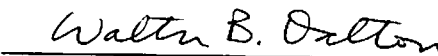
  
Eric M. Hurt  
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VA Bar # 35765

  
Andrew Heyward  
Third Year Law Student  
Intern-United States Attorney's Office

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, DION BARTLETT and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
DION BARTLETT

I am DION BARTLETT's attorney and I have carefully reviewed the above Statement of Facts with the defendant. To my knowledge, the decision to stipulate to these facts is an informed and voluntary one.

  
Walter Dalton  
Attorney for DION BARTLETT

D.B.  
WBD  
9/4/11